

LAW OFFICES OF  
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July 28, 2022

VIA ECF

**MEMO ENDORSED**

Hon. Katherine Polk Failla  
United States District Judge  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re:    *United States of America v. Christian Baez*, 19 Cr. 690 (KPF)**

Dear Judge Failla,

I am counsel to defendant Christian Baez in the above-captioned case. I write to respectfully request a modification of my client's pretrial release status. Mr. Baez is seeking to make a one-day trip outside of his specified judicial districts on July 28, 2022 for his son's birthday. Mr. Baez requests permission to travel to the District of New Jersey for a family trip to a water park located at 1 American Dream Way, East Rutherford, NJ 07073. Accordingly, I respectfully request Mr. Baez be permitted to travel to the desired location in the District of New Jersey from 12:00pm to 10:00pm on July 28, 2022. Pretrial and the Government do not object to this request.

Thank you for your attention to this matter.

Very truly yours,



Daniel A. McGuinness

Cc: All Counsel (via ECF)

Application GRANTED. Mr. Baez is permitted a one-day modification of his pretrial release status in line with this letter.

The Clerk of Court is directed to terminate the pending motion at docket entry 238.

Dated: July 25, 2022  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE